

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 10-31-2021

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

KARV Communications

(b) Registration Number

6162

(c) Primary Business Address

122 East 42nd Street - Suite 2005
New York, NY 10168

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Andrew Frank	President	The Public Investment Fund of	6/30/2021
Eric Andrus	Executive Vice President	Saudi Arabia (PIF)	
Kevin Nolan	Sr. Vice President		
Jonathan Leibowitz	Director		

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

The Public Investment Fund of Saudi Arabia (PIF)*

Date of Termination

6/30/2021

*The work ceased in June 2021, however full payment for services was not received during this reporting period.

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Ukrainian Federation of Employers of the Oil and Gas Industry
(UFEOGI)

Date Added

7/9/2021

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

Stiftung Pressischer Kulturbesitz (SPK) (through Wiggin and Dana LLP)
Emirate of Ras Al Khaimah (RAK)

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³Yes ☒No ☐N/A ☐Exhibit B⁴Yes ☒No ☐N/A ☐

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☒No ☐

If yes, has the registrant filed an amendment to these exhibits?

Yes ☒No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
see attached	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.
see attached

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
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13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services
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⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, please explain why no monies were received.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
see attached					

\$720,396.63

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, has the registrant previously filed an Exhibit D⁸ to its registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value

^{6, 7} A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS-MONIES**

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal see attached	Date	Recipient	Purpose	Amount	Subtotal
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\$5181.40

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
6/22/2021	Andrew Frank	Alex Padilla for Senate		\$500.00

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

Emirate of Ras Al Khaimah (RAK)

Ukrainian Federation of Employers of the Oil and Gas Industry (UFEOGI)

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|---|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input checked="" type="checkbox"/> Email | | | |
| <input checked="" type="checkbox"/> Website URL(s): <u>www.rakinfo.ae</u> | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|---|---|---|
| <input type="checkbox"/> Public officials | <input checked="" type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input checked="" type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input checked="" type="checkbox"/> Other (specify) <u>General Public (website)</u> | | |

20. Indicate the language used in the informational materials:

- ☒ English ☐ Other (specify) _____

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

If no, please please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☒ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature ¹³	eSigned
November 30, 2021	Andrew Frank	/s/ Andrew Frank	

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Filing period: 5/1/2021 thru 10/31/2021

KARV Communications – 6162
Supplemental
Attachment for Question 11

Q. 11 During this 6-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail your activities and services.

Yes.

Stiftung Pressischeer Kulturbesitz (SPK) (through Wiggin and Dana LLP):

The registrant provided communications and public affairs support services regarding ongoing litigation by providing outreach to media, civil society, the arts community, religious organizations, and U.S. government officials.

Emirate of Ras Al Khaimah (RAK):

The registrant provided public affairs and communications advice to the foreign principal on various issues facing RAK in the U.S., and elsewhere. Additionally, the registrant provided business development guidance to RAK and oversaw the maintenance of the www.rakinfo.ae website, as registrant covered costs associated with maintaining the site as well as provided the foreign principal with overall advice and guidance related to the site's content.

Ukrainian Federation of Employers of the Oil and Gas Industry (UFEOGI)

The registrant provided public relations and media relations outreach and advice to the foreign principal aimed at improving the reputation of the Ukrainian oil and gas industry as well as promoting energy security issues in the U.S.

**Note: the registrant terminated its relationship with the Public Investment Fund (PIF) in June 2021, however full payment was not received during this reporting period.*

Filing period: 5/1/2021 thru 10/31/2021

KARV Communications – 6162
Supplemental
Attachment for Question 12

Q. 12 During this 6 month period, have you on behalf of any foreign principal engaged in political activity as defined below? If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Yes.

Stiftung Pressischeer Kulturbesitz (SPK) (through Wiggin and Dana LLP):

The registrant provided communications and public affairs support services regarding ongoing litigation by providing outreach to media. No media contacts to disclose during this reporting period.

Emirate of Ras Al Khaimah (RAK):

The registrant provided public affairs and communications advice to the foreign principal on various issues facing RAK in the U.S., and elsewhere. Additionally, the registrant provided business development guidance to RAK and oversees the maintenance of the www.rakinfo.ae website. No media contacts to disclose during this reporting period.

Ukrainian Federation of Employers of the Oil and Gas Industry (UFEOGI):

The registrant provided public relations and media relations outreach and advice to the foreign principal aimed at improving the reputation of the Ukrainian oil and gas industry as well as promoting energy security issues in the U.S. Outreach was made to think tanks, NGO's, and media representatives. Specific media outreach is listed below:

Date	Media Outlet	Type of Communication	Topic
7/14	ABC	Email	Pitching interview with UFEOGI leadership
10/14	Al Jazeera	Email	Pitching interviews with UFEOGI leadership
7/19-9/30	American Purpose	Phone/Emails	Discussion of editorial interest on issues of importance to UFEOGI
7/10-7/12	The Atlantic	Phone/Email	Pitching interviews with UFEOGI leadership; Discussion on policy issues of importance to UFEOGI
8/30	Axios	Email	Pitching interviews with UFEOGI leadership, share informational materials of interest
7/13-16	Bloomberg News	Email	Request referral to colleague re: potential UFEOGI interview
7/16-10/19	Bloomberg News	Phone/Email	Pitching and scheduling interviews with UFEOGI leadership; share informational materials of interest
7/21	Bloomberg News	Meeting	Interview with UFEOGI leadership
07/19-8/29	Breaking Points	Email	Pitching interviews with UFEOGI leadership, share informational materials of interest
07/21-8/29	CBS	Email	Pitching interviews with UFEOGI leadership and share informational materials of interest
7/15-10/15	CNBC	Emails	Pitching interviews with UFEOGI leadership, share informational materials of interest
9/16	CNBC	Zoom Meeting	Interview with UFEOGI leadership
7/15-10/26	CNN	Emails, texts, phone calls	Pitching interviews with UFEOGI leadership, share informational materials of interest
9/19	CNN	Meeting	Discussion regarding policy issues of interest to UFEOGI
8/30	Congressional Quarterly	Email	Pitching interviews with UFEOGI leadership
7/13-9/15	Daily Beast	Email/phone	General Inquiry regarding coverage of policy issues of interest to UFEOGI
7/29	Energy Intelligence	Email	Pitching interviews with UFEOGI leadership
7/1-10/27	Financial Times	Email/phone	Discussion on policy issues of interest to UFEOGI

Date	Media Outlet	Type of Communication	Topic
7/20-10/19	Foreign Policy	Emails/phone calls/texts	Pitching interviews with UFEOGI leadership, share informational materials of interest
08/30	Fortune	Email	Pitching interviews with UFEOGI leadership
7/13-10/26	Fox News	Email	Pitching interviews with UFEOGI leadership, share informational materials of interest
7/16-8/13	MSNBC	Email	Pitching interviews with UFEOGI leadership
9/10	National Interest	Meeting	Meeting, discussion on editorial interest
7/12-08/22	National Review	Email/Phone	Discussion on policy issues of interest to UFEOGI
8/15-10/26	National Review	Email/Phone	Discussion on policy issues of interest to UFEOGI
8/11-10/27	Natural Gas World	Email/phone/text	Pitching interviews with UFEOGI leadership, share informational materials of interest
8/20	Natural Gas World	Zoom meeting	Interview with UFEOGI leadership
07/15-9/20	New York Post	Email	Inquiry regarding potential op-ed
10/25-10/26	New York Times	Email	Pitching interviews with UFEOGI leadership
7/13-8/27	NPR	Email	Pitching interviews with UFEOGI leadership
8/15	PBS	Email	Pitching interviews with UFEOGI leadership
7/15-9/28	PBS	Emails; Phone calls	Pitched potential TV interviews with UFEOGI leadership
7/16-10/20	Politico	Email/Phone/text	Pitching interviews with UFEOGI leadership, share informational materials
8/31	Politico	Zoom meeting	Interview with UFEOGI leadership
7/29	Power Magazine	Email	Pitching interviews with UFEOGI leadership
7/19-10/19	Reuters	Emails and texts	Pitching interviews with UFEOGI leadership, share informational materials
7/21	Reuters	Meeting	Interview with UFEOGI leadership
8/30	Reuters	Meeting	Interview with UFEOGI leadership
9/7	Shale Magazine	Email	Pitching interviews with UFEOGI leadership
7/5 -10/28	Tablet Magazine	Facebook messenger, email, phone,	Pitching interviews with UFEOGI leadership, discussion on policy issues of interest to UFEOGI, share informational materials
10/25-10/30	The Economist	Emails, texts, calls	Pitching interviews with UFEOGI leadership and arrange interview
7/19-8/27	The Hill	Emails	Pitching interviews with UFEOGI leadership and editorial follow up
9/7-9/25	Upstream Online	Emails	Pitching interviews with UFEOGI leadership
7/19	Vice	Email	Pitching interviews with UFEOGI leadership
7/10-9/24	VOA	Phone/Email	Pitching Interviews with UFEOGI leadership
7/11-9/20	Wall Street Journal	Email	Pitching interviews with UFEOGI leadership, share informational materials
10/25-10/27	Wall Street Journal	Email	Pitching interviews with UFEOGI leadership, share informational materials
10/26	Wall Street Journal	Meeting	Interview with UFEOGI leadership
7/16-7/21	Washington Post	Emails	Pitching interviews with UFEOGI leadership and editorial follow up
8/27-10/19	Washington Times	Emails/Phone	Pitching interviews with UFEOGI leadership, share informational materials
8/30	Washington Times	Meeting	Interview with UFEOGI leadership
8/02-8/05	World Oil	Emails	Pitching interviews with UFEOGI leadership
10/4-10/21	World Pipelines	Emails	Pitching interviews with UFEOGI leadership; op-ed discussion
07/13	Yahoo Finance	Email	Pitching interviews with UFEOGI leadership; share informational materials

Filing period: 5/1/2021 thru 10/31/2021

KARV Communications – 6162
Supplemental
Attachment for Question 14(a)

Q. 14(a) During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

Yes.

Emirate of Ras Al Khaimah (RAK)

6/23/2021	Payment of Fees and Cost per agreement	\$80,000.00
7/15/2021	Payment of Fees and Cost per agreement	\$40,000.00
8/17/2021	Payment of Fees and Cost per agreement	\$40,000.00
9/16/2021	Payment of Fees and Cost per agreement	\$40,000.00
10/12/2021	Payment of Fees and Cost per agreement	\$40,000.00

Public Investment Fund (PIF) (terminated)

8/30/2021	Payment of fees and Cost per agreement	\$113,960.00
9/23/2021	Payment of fees and Cost per agreement	\$227,960.00

Stiftung Pressischer Kulturbesitz (SPK) (through Wiggin and Dana LLP)

5/7/2021 – Mar fee	Payment of fees and Cost per agreement	\$7,284.42
5/21/2021 – Apr fee	Payment of fees and Cost per agreement	\$1,168.13
7/30/21 – May fee	Payment of fees and Cost per agreement	\$3,136.91
8/13/2021 -Jun fee	Payment of fees and Cost per agreement	\$3,071.27
10/12/2021-Jul & Aug fees	Payment of fees and Cost per agreement	\$3,150.01
10/15/2021 – Sept fee	Payment of fees and Cost per agreement	\$721.89

Ukrainian Industry Association “Federation of Employers of the Oil and Gas Industry (UFEOGI)

9/29/2021	Payment of fees and Cost per agreement	\$59,972.00
10/25/2021	Payment of fees and Cost per agreement	\$59,972.00

TOTAL \$720,396.63

Period – 5/1/2021 thru 10/31/2021

KARV Communications – 6162
Supplemental
Attachment for Question 15(a)(1)

Q. 15(a)(1) During this 6 month reporting period, have you disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Yes.

Emirate of Ras Al Khaimah (RAK)

6/23/2021	Telephone calls	265.00
7/15/2021	Telephone calls	175.00
7/29/2021	Payment to vendor for web hosting www.rakinfo.ae	120.00
7/29/2021	Payment to vendor for web hosting www.rakinfo.ae	600.00
8/17/2021	Telephone calls	135.00
9/16/2021	Telephone calls	120.00
10/12/2021	Telephone calls	136.00
10/31/2021	FARA Filing Fee	305.00

Stiftung Pressischer Kulturbesitz (SPK) (through Wiggin and Dana LLP)

5/5/2021	April payment to contractor Norm Kurtz	375.00
5/7/2021	Telephone calls	57.75
5/21/2021	Telephone calls	26.25
6/2/2021	May payment to contractor employee Norm Kurtz	500.00
7/4/2021	June payment to contractor employee Norm Kurtz	625.00
7/30/2021	Telephone calls	63.55
8/2/2021	Aug. payment to contractor employee Norm Kurtz	500.00
8/13/2021	Telephone calls	45.15
9/2/2021	Sept. payment to contractor employee Norm Kurtz	750.00
10/12/2021	Telephone calls	58.80
10/15/2021	Telephone calls	18.90
10/31/2021	FARA Filing Fee	305.00

Total: \$5,181.40